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Corporation, China National Minerals Co.,
Ltd.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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ANIMAL SCIENCE PRODUCTS, INC., et al.,

Plaintiffs,

- v. -

CHINA MINMETALS CORPORATION, et
al.,

Defendants.

: Civil No. 2:05-cv-04376 (KM) (MAH)

:

: **NOTICE OF MOTION TO DISMISS**
: **PLAINTIFFS' SECOND AMENDED**
: **CLASS ACTION COMPLAINT**

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TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on February 17, 2015, or as soon thereafter as counsel
can be heard, Defendants China Minmetals Corporation, China National Minerals Co., Ltd.,

Sinosteel Corp., Sinosteel Trading Co., and Liaoning Jiayi Metals & Minerals Co., Ltd., by and through its undersigned counsel, shall move before the Honorable Kevin McNulty, to dismiss Plaintiffs' Second Amended Class Action Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) & 12(b)(6).

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, the Defendants submit a Memorandum in Support of Motion to Dismiss Plaintiffs' Second Amended Class Action Complaint, the Declaration of Thomas Pak, and a Proposed Order.

Dated: January 20, 2015

Respectfully submitted,

Skadden, Arps, Slate, Meagher & Flom LLP

Robinson, Wettre & Miller LLC

By: /s/ Shepard Goldfein
Shepard Goldfein

By: /s/ Keith J. Miller
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Ltd.*

CERTIFICATE OF SERVICE

I, Keith J. Miller, certify that on January 20, 2015, I caused a true and correct copy of the Notice of Motion to Dismiss Plaintiffs' Second Amended Class Action Complaint; Memorandum in Support of Motion to Dismiss Plaintiffs' Second Amended Class Action Complaint; Declaration of Thomas Pak; and proposed form of Order to be filed and served upon all counsel of record via CM/ECF.

/s/ Keith J. Miller
Keith J. Miller